

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

United States of America

v.

Issac Lorenzo Rodriquez

No.

22-8361 MJ

CRIMINAL COMPLAINT

(Filed Under Seal)

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

On or about the dates described in Attachment A in the County of Maricopa in the District of Arizona, the defendant violated 18 U.S.C. §§ 2251(a) and 2251(e); 18 U.S.C. §§ 2252(a)(2) and 2252(b)(1); 18 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2); and 18 U.S.C. § 2256, offenses described as follows:

See Attachment A – Description of Counts

I further state that I am a Special Agent from the Federal Bureau of Investigation and that this complaint is based on the following facts:

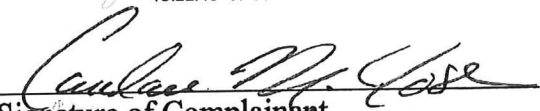
See Attachment B – Statement of Probable Cause Incorporated by Reference Herein.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

AUTHORIZED BY: Gayle Helart / Brett A. Day, AUSAs **GAYLE
HELART**

Digitally signed by
GAYLE HELART
Date: 2022.10.14
13:22:48 -07'00'

SA Candace M. Rose, FBI
Name of Complainant


Signature of Complainant

Subscribed and sworn electronically

October 14, 2022
Date

at Phoenix, Arizona
City and State

HONORABLE JOHN Z. BOYLE
United States Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

ATTACHMENT A
DESCRIPTION OF COUNTS

COUNT 1

On about September 6, 2022, in the District of Arizona, Defendant ISSAC LORENZO RODRIQUEZ did attempt to knowingly employ, use, persuade, entice, induce and coerce a minor, that is, Jane Doe, age 2, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct and transmitting a live visual depiction of such conduct knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce and mailed if the visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and did attempt to do so.

In violation of Title 18, United States Code, Sections 2251(a), 2251(e) and 2256.

COUNT 2

On about September 11, 2022, in the District of Arizona, Defendant ISSAC LORENZO RODRIQUEZ did attempt to knowingly employ, use, persuade, entice, induce and coerce a minor, that is, Jane Doe, age 2, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct and transmitting a live visual depiction of such conduct knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce and mailed if the visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and

1 did attempt to do so.

2 In violation of Title 18, United States Code, Sections 2251(a), 2251(e) and 2256.

3 **COUNT 3**

4 On about September 13, 2022, in the District of Arizona, Defendant ISSAC LORENZO
5 RODRIQUEZ did attempt to knowingly employ, use, persuade, entice, induce and coerce a
6 minor, that is, Jane Doe, age 2, to engage in sexually explicit conduct for the purpose of
7 producing any visual depiction of such conduct and transmitting a live visual depiction of such
8 conduct knowing and having reason to know that the visual depiction would be transported and
9 transmitted using any means and facility of interstate and foreign commerce, and in and
10 affecting interstate and foreign commerce and mailed if the visual depiction was produced and
11 transmitted using materials that have been mailed, shipped, and transported in and affecting
12 interstate and foreign commerce by any means, including by computer, and such visual
13 depiction was actually transported and transmitted using any means and facility of interstate
14 and foreign commerce and in and affecting interstate and foreign commerce and mailed, and
15 did attempt to do so.

16 In violation of Title 18, United States Code, Sections 2251(a), 2251(e) and 2256.

17 **COUNT 4**

18 On about September 21, 2022, in the District of Arizona, Defendant ISSAC LORENZO
19 RODRIQUEZ did attempt to knowingly employ, use, persuade, entice, induce and coerce a
20 minor, that is, Jane Doe, age 2, to engage in sexually explicit conduct for the purpose of
21 producing any visual depiction of such conduct and transmitting a live visual depiction of such
22 conduct knowing and having reason to know that the visual depiction would be transported and
23 transmitted using any means and facility of interstate and foreign commerce, and in and
24 affecting interstate and foreign commerce and mailed if the visual depiction was produced and
25 transmitted using materials that have been mailed, shipped, and transported in and affecting
26 interstate and foreign commerce by any means, including by computer, and such visual
27 depiction was actually transported and transmitted using any means and facility of interstate
28 and foreign commerce and in and affecting interstate and foreign commerce and mailed, and

1 did attempt to do so.

2 In violation of Title 18, United States Code, Sections 2251(a), 2251(e) and 2256.

3 **COUNT 5**

4 On or about September 17, 2022, in the District of Arizona, and elsewhere, Defendant
5 ISSAC LORENZO RODRIQUEZ did knowingly distribute visual depictions that involved the
6 use of a minor engaging in sexually explicit conduct and such visual depiction was of such
7 conduct. The visual depictions distributed were in a social media platform. The visual
8 depictions had been mailed, had been shipped and transported using any means and facility of
9 interstate and foreign commerce and in and affecting interstate and foreign commerce, and had
10 been produced using materials which had been mailed, shipped, and transported by any means,
11 including by computer. Some of the visual depictions of minors engaged in sexually explicit
12 conduct are listed below:

13 IMG_0268.JPG

14 IMG_0278.JPG

15 In violation of Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1), and 2256.

16 **COUNT 6**

17 On or about September 19, 2022, in the District of Arizona, and elsewhere, Defendant
18 ISSAC LORENZO RODRIQUEZ did knowingly distribute visual depictions that involved the
19 use of a minor engaging in sexually explicit conduct and such visual depiction was of such
20 conduct. The visual depictions distributed were in a social media platform. The visual
21 depictions had been mailed, had been shipped and transported using any means and facility of
22 interstate and foreign commerce and in and affecting interstate and foreign commerce, and had
23 been produced using materials which had been mailed, shipped, and transported by any means,
24 including by computer. Some of the visual depictions of minors engaged in sexually explicit
25 conduct are listed below:

26 328D0E3E-D856-4994-94F8-CB9EAE94F8F9.jpeg

27 In violation of Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1), and 2256.

COUNT 7

On or about September 21, 2022, in the District of Arizona, and elsewhere, Defendant ISSAC LORENZO RODRIQUEZ did knowingly distribute visual depictions that involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct. The visual depictions distributed were in a social media platform. The visual depictions had been mailed, had been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and had been produced using materials which had been mailed, shipped, and transported by any means, including by computer. Some of the visual depictions of minors engaged in sexually explicit conduct are listed below:

F070BFC7-C8A1-4059-A936-D0B3E191B9A7.jpeg

In violation of Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1), and 2256.

COUNT 8

Between on or about September 17, 2022 to September 21, 2022, in the District of Arizona, and elsewhere, Defendant ISSAC LORENZO RODRIQUEZ did knowingly possess and knowingly access with intent to view visual depictions that involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct. The visual depictions possessed and accessed with intent to view by Defendant ISSAC LORENZO RODRIQUEZ were contained on a cellular telephone. The visual depictions on the cellular telephone had been mailed, had been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and had been produced using materials which had been mailed, shipped, and transported, by any means, including by computer. Some of the visual depictions of minors engaged in sexually explicit conduct are listed below:

IMG_0268.JPG

IMG_0278.JPG

328D0E3E-D856-4994-94F8-CB9EAE94F8F9.jpeg

F070BFC7-C8A1-4059-A936-D0B3E191B9A7.jpeg

1 In violation of Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2), and
2 2256.
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STATEMENT OF PROBABLE CAUSE
IN SUPPORT OF A CRIMINAL COMPLAINT

I, Candace M. Rose, Special Agent with Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

INTRODUCTION

The facts of this case, as more fully detailed herein, are that on dates between September 17, 2022 and September 27, 2022, a Wickr user with a username of "sanchez.adrian@my.com" was a member of a Wickr Group (referred to in this affidavit as "Group A"). An undercover Special Agent (SA) with the Federal Bureau of Investigation (FBI) was part of this Group and observed members post videos and images depicting the sexual exploitation and/or abuse of children. The undercover SA also engaged in direct communication with "sanchez.adrian@my.com" on Wickr. On September 17, 2022, "sanchez.adrian@my.com" indicated that he was in contact with two active child pornography producers on Telegram and Instagram. The user "sanchez.adrian@my.com" sent Child Sexual Abuse Material (CSAM) directly to the undercover SA. He indicated that he received the CSAM directly from the producers and he posted the CSAM in "Group A."

The user "sanchez.adrian@my.com" stated that one of the producers was in Chicago and that he had sent the producer in Chicago panties for the victim, whom he believed to be toddler aged. This information was corroborated, a suspect in Chicago was arrested, and a two-year-old girl was rescued.

Agents were able to obtain the sales transaction for the panties and it showed that the purchaser was ISSAC RODRIQUEZ. Through direct communication with the undercover SA, "sanchez.adrian@my.com" indicated that he lived in Phoenix and worked as a landscaper. A review of communications between the Chicago suspect and who is believed to be the Phoenix subject via the Telegram application showed that the Phoenix subject stated his real name is "ISSAC." Investigative steps identified an IP Address believed to be associated with the Wickr user "sanchez.adrian@my.com" and an IP Address used to purchase the panties which were sent to the Chicago suspect. Both of these IP Addresses resolved to the Lumen Technologies

1 residential account in the name of Ernesto Rodriguez at 2308 East Chipman Road, Phoenix,
2 Arizona 85040. Record checks identified that ISSAC LORENZO RODRIQUEZ also resides
3 at the house and is employed by a landscaping company.

4 In this affidavit, I believe there is probable cause to believe that ISSAC LORENZO
5 RODRIQUEZ produced or attempted to produce child pornography in violation of 18 U.S.C. §§
6 2251(a) and 2251(e); and distributed child pornography in violation of 18 U.S.C. §§ 2252(a)(2)
7 and 2252(b)(1); and possessed child pornography in violation of 18 U.S.C. §§ 2252(a)(4)(B)
8 and 2252(b)(2); and 18 U.S.C. § 2256.

9 **PRELIMINARY BACKGROUND INFORMATION**

10 1. I am a Special Agent with the FBI assigned to the Phoenix Division. I have been so
11 employed for eighteen years and I am specifically assigned to conduct investigations pursuant
12 to the FBI's Innocent Images National Initiative (IINI), which focuses on crimes where
13 computers and the Internet are used in the sexual exploitation of children. I am responsible for
14 conducting federal and international investigations relating to crimes involving the sexual
15 exploitation of children. I have received basic, advanced, and on-the-job training in the
16 investigation of cases involving the sexual exploitation of children. The statements contained
17 in this Affidavit are based on my experience and background as a Special Agent and on
18 information provided by other law enforcement agents.

19 **DETAILS OF THE INVESTIGATION**

20 2. Between at least September 17, 2022 and September 27, 2022, an undercover Special Agent
21 (SA) with the Federal Bureau of Investigation (FBI) was part of a Wickr chat group, hereinafter
22 referred to as Group A. [The actual name of the group is known to your affiant but is being
23 redacted in order to protect other ongoing investigations]. Group A was comprised of members
24 who appeared to have a sexual interest in children primarily between the ages of zero to four
25 years old. Participants in this chat group shared images and videos that contained Child Sexual
26 Abuse Material (CSAM). An individual utilizing the Wickr username
27 "sanchez.adrian@my.com" was a member of Group A.

28 14. On approximately September 17, 2022, "sanchez.adrian@my.com" sent the undercover SA

1 images of a toddler aged female wearing only panties, or panties over a diaper. The characters
2 depicted on the panties in some of these images appear to be from the show/books "Peppa Pig."
3 He (sanchez.adrian@my.com) indicated that he received the images from a person in Chicago
4 (SUBJECT 1). He (sanchez.adrian@my.com) stated he was communicating with SUBJECT 1
5 in Chicago on Telegram, and he (sanchez.adrian@my.com) had sent the panties to SUBJECT 1
6 through Amazon. During the same communication, "sanchez.adrian@my.com" stated that he
7 lives in Arizona and does landscaping and tree trimming. He then asked the undercover SA if
8 he saw the nudes of her from last week that he shared in the group. Then,
9 "sanchez.adrian@my.com" proceeded to send the undercover SA the images, which can be
10 described as follows (**Count 5**):

11 a) IMG_0268.JPG: This image depicts a toddler aged female who is nude and laying on
12 her back. There is a diaper under her bottom, but it is pulled down. Her legs are spread apart,
13 exposing her genitalia.

14 b) IMG_0278.JPG: This image depicts the close-up of an adult male penis that is pulled
15 through his underwear or shorts. There is a child size hand touching the penis.

16 3. On approximately September 19, 2022 (**Count 6**), "sanchez.adrian@my.com" sent the
17 undercover SA images which contained CSAM and stated they were sent to him from an
18 individual he identified as "Luna's dad" (SUBJECT 2). One of the images can be described as
19 follows:

20 a) 328D0E3E-D856-4994-94F8-CB9EAE94F8F9.jpeg: This image depicts the close up
21 of a prepubescent minor female's genitalia. Her legs are spread and a part of a diaper can be
22 seen under her bottom. An adult male is pushing his penis against her genitalia. Based on size
23 and appearance, and lack of genitalia development, the child appears to be under the age of two.

24 4. On September 19, 2022, at approximately 4:19 p.m., UTC, the undercover SA sent a web
25 link to "sanchez.adrian@my.com" and requested his opinion on the items to see if the girl in
26 Chicago would like a particular item. The link contained a publicly available tool which
27 captured an IP Address that resolved to the Phoenix area. The identified IP Address was
28 97.124.245.78, which belongs to Lumen Technologies (formerly CenturyLink).

1 5. On September 20, 2022, Lumen Technologies responded to a subpoena requesting
2 subscriber information for the IP Address 97.124.245.78 during the relevant date/time. They
3 advised the IP address belonged to the residential account in the name of Ernesto Rodriguez at
4 2308 E. Chipman Rd., Phoenix, AZ 85040.

5 6. On September 21, 2022, "sanchez.adrian@my.com" sent a direct message to the undercover
6 SA with the message "Guess what Chicago boy sent me this morning." The image can be
7 described as follows (**Count 7**):

8 a) F070BFC7-C8A1-4059-A936-D0B3E191B9A7.jpeg: This image depicts the close up
9 of the buttocks of what appears to be a child. The child's diaper or pull-up is pulled down,
10 exposing his/her buttocks. There is a pair of pink panties over the diaper or pull-up which is
11 also pulled down. There is a white substance, consistent with the appearance of ejaculate, in
12 between the child's buttocks.

13 7. During the direct communication on September 21, 2022, "sanchez.adrian@my.com"
14 confirmed that he was communicating with SUBJECT 1 on Telegram. He then provided the
15 address for SUBJECT 1 as 3511 W. 61st St. Chicago, IL 60629. This is the shipping address
16 used for the panties sent for the child in Chicago.

17 8. Law enforcement officers in Chicago arrested SUBJECT 1 and identified the two-year-old
18 female child (VICTIM 1) that he was molesting and using to produce CSAM. The investigation
19 is ongoing. As part of their investigation, they reviewed SUBJECT 1's phone. Chicago
20 authorities advised that SUBJECT 1 was in communication via Telegram with username
21 "@omar91zx," display name "Omar Smith." In these communications, which occurred
22 between approximately July 30, 2022 and September 22, 2022, "@omar91zx" sent numerous
23 images and videos of CSAM to SUBJECT 1 and requested images and videos of VICTIM 1.
24 SUBJECT 1 sent numerous images and videos of CSAM to "@omar91zx" as well as images
25 and videos depicting VICTIM 1. The two discussed engaging in sex acts with each other and
26 with VICTIM 1.

27 a) On September 6, 2022, (**Count 1**) the two had the following conversation:

28 @omar91zx: Can you take a pic

1 SUBJECT 1: Sends an image depicting VICTIM 1 wearing only a diaper

2 @omar91zx: Yes

3 Can you pull her diaper down

4 SUBJECT 1: I can't right now there's people around

5 @omar91zx: Maybe later

6 SUBJECT 1: But my dick is hard though

7 @omar91zx: Mine too

8 Can you take a pic of her butt

9 I see a wet spot

10 SUBJECT 1: Sends an image where toddler sized hands can be seen pulling the waist band
11 of pants/shorts away from an adult male, exposing pink underwear. Based on the clothing and
12 blankets in the picture, this image appears to be taken at or around the same time as the image
13 described above in paragraph 14(b).

14 @omar91zx: She wants it

15 Pull it out

16 SUBJECT 1: Yep she does

17 @omar91zx: I want to see her hands around it

18 Make a quick vid of her rubbing it

19 SUBJECT 1: I'll do that later on tonight

20 @omar91zx: Ok I have a good vid for you

21 I want to see her naked

22 On your cock

23 SUBJECT1: I will and what kind of video is it

24 @omar91zx: It's two actually [sends two images depicting the close up of foreign objects
25 anally penetrating a toddler sized female, whose genitalia is exposed. What appears to be an
26 adult sized hand is holding the objects. The child has what appears to be a diaper rash.

27 9. SUBJECT 1 and @omar91zx discuss how @omar91zx will purchase panties for VICTIM
28 1 and send them to SUBJECT 1. On September 11, 2022, @omar91zx sent SUBJECT 1 a

screenshot of the order/purchase of "Peppa Pig Girls' Underwear Multipacks," size 2T-3T. He then sent a screenshot of the Amazon purchase of the underwear with the order details. At the top of the screenshot, it says "Deliver to Issac – Chicago 60629". The Telegram user "@omar91zx" then messaged, "That's my real name." SUBJECT 1 wrote, "You never told me what's your real name." The user @omar91z wrote, "Not safe to give your real name lol." "I am Omar here Mason on instagram but Issac is my real name. Now you know."

10. On September 11, 2022, @omar91zx sent a video that was eleven seconds in length to SUBJECT 1. The video depicted a small child whose face nor genitalia could be seen. The child was on their side on what appeared to be a bed with Hello Kitty sheets. The child's diaper was unattached and under the child's body. An adult male masturbates and ejaculates on the child's hip area. The two commented (**Count 2**):

@omar91zx: Baby girl [emoji with tongue out]

SUBJECT 1: She will like that on her she likes it when I do it to her

@omar91zx: Can you take a pic like that later

SUBJECT 1: Sure I'll try

@omar91zx: Thank you

SUBJECT 1: You're welcome

11. On September 13, 2022 (**Count 3**), @omar91zx and SUBJECT 1 engage in the following conversation:

@omar91zx: Daddy want pics of baby girl

Hopefully tonight want to see her naked

SUBJECT 1: I will try don't forget I need to try to be careful

@omar91zx: Understandable

Mmmmm

More can I see her face

SUBJECT 1: She's moving around so much but she's wearing the underwear if you got her

@omar91zx: Let me see

1 Take a vid

2 SUBJECT 1: She's not letting me she keeps putting the covers over her

3 @omar91zx: Record under the covers

4 More

5 SUBJECT 1: I can't somebody almost came in the bedroom when I was trying to take
6 another picture

7 @omar91zx: Do it when they leave

8 Can you make a short vid love to her face

9 They look sexy on her

10 SUBJECT 1: Do you want to come all over her beautiful face

11 @omar91zx: Yes

12 Does she like them

13 @omar91zx: Can you take pics

14 Daddy is hard

15 Mmmmm

16 Send me more

17 She is so sexy in her new panties

18 SUBJECT 1: I will try but I have to be careful

19 @omar91zx: Ok

20 Just a few more babe

21 SUBJECT 1: Sends an image of what is believed to be VICTIM 1. The child's face
22 cannot be seen. She is wearing Peppa Pig underwear over a diaper. Her legs are spread apart
23 and there is a purple beaded object inserted in the crotch area of the diaper.

24 @omar91zx: More

25 Can you pull her diaper to the side

26 So I can see her puss

27 SUBJECT 1: I will try

28 @omar91zx: Ok

1 Mmmm is that in her puss

2 Can you make a vid

3 SUBJECT 1: I can't the lights bothering her when I put it on

4 12. On September 21, 2022, @omar91zx asks SUBJECT 1, "Did you take pics last night?"

5 SUBJECT 1 sent an image, which is the same as the one described in paragraph 18(a) above.

6 The following conversation ensued (Count 4):

7 @omar91zx: Mmmm

8 You did it

9 More ?

10 SUBJECT 1: Yep I did that last night when she was sleeping

11 @omar91zx: Mmmmm

12 What about her puss

13 SUBJECT 1: No I didn't do that yet probably later on tonight

14 @omar91zx: Take pics if you can

15 SUBJECT 1: Ok

16 13. Your affiant served a subpoena on Amazon requesting information on the order associated
17 with the screenshot of the purchase made by @omar91zx. They responded that the item Peppa
18 Pig Girls' Underwear Multipacks was purchased on September 11, 2022 from the customer
19 account in the name of ISSAC RODRIQUEZ, billing address 2308 E. Chipman Rd., Phoenix,
20 AZ 85040, billing phone number (602) 684-6531. The IP Address used to make the purchase
21 was 97.124.226.77. The shipping address was in the name ISSAC RODRIQUEZ at 3511 W.
22 61st Street, Chicago, IL 60629.

23 14. On October 6, 2022, your affiant served a subpoena on Lumen Technologies for subscriber
24 information related to IP Address 97.124.226.77. Lumen Technologies responded that the IP
25 Address belonged to the residential account in the name of Ernesto Rodriguez at 2308 E.
26 Chipman Rd., Phoenix, AZ 85040.

27 15. A review of Arizona Motor Vehicle Department (AZMVD) records showed that ISSAC
28 LORENZO RODRIQUEZ, Year of Birth (YOB) 1996, utilizes 2308 E. Chipman Road, Phoenix,

1 AZ 85040 on his driver's license.

2 16. A review of Arizona wage records showed that ISSAC LORENZO RODRIQUEZ is
3 employed by Progressive Landscapes.


4 17. A search of Maricopa County Assessor records shows that Castro Ernesto Rodriguez is the
5 current owner of 2308 E. Chipman Road, Phoenix, AZ 85040.

6 18. On October 12, 2022 and October 13, 2022, ISSAC LORENZO RODRIQUEZ was
7 observed departing the residence at 2308 E. Chipman Road on a bicycle at approximately 5:30
8 a.m. On October 12, 2022, he had a backpack with him. He was wearing what appeared to be
9 work attire. For the past week, ISSAC LORENZO RODRIQUEZ has been observed returning
10 to the residence at approximately 3:30 p.m.

11 **CONCLUSION**

12 19. Based on the foregoing, I believe that there is probable cause to arrest ISSAC LORENZO
13 RODRIQUEZ that he knowingly produced or attempted to produce child pornography in
14 violation of 18 U.S.C. §§ 2251(a) and 2251(e); and distributed child pornography in violation
15 of 18 U.S.C. §§ 2252(a)(2) and 2252(b)(1); and possessed child pornography in violation of 18
16 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2); and 18 U.S.C. § 2256, all of which occurred within the
17 District of Arizona.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 forgoing is true and correct.

20
21 
22 Candace M. Rose
23 Special Agent
Federal Bureau of Investigation

24 Sworn to before me telephonically this 14th day of October, 2022.

25
26 
27 HONORABLE JOHN Z. BOYLE
28 United States Magistrate Judge